

## MEETING NOTES

No. 1

**Date:** May 3, 2004

**Place:** IDNR Conference Room 1

**Project/Purpose:** NSR  
PAL Workgroup

**Attendees:** Rich Stephens, ADM  
Lisa Larson, Larson Engineering  
Michael Li, Alliant Energy  
Joe Winch, Pella Corp.  
Larry Carlson, HDR  
Scott Nielson, Lafarge NA  
Tom Hansen, Omega Cabinets  
Steve Pace, Shuttleworth & Ingersoll  
Jim Nitzschke, Deere & Company  
Mick Durham, Stanley Consultants  
Chris Roling, IDNR  
Jim McGraw, IDNR

**Notes By:** Mick Durham

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The following meeting notes set forth our understanding of the discussions and decisions made at this meeting. If you have any questions, additions, or comments, please contact the writer immediately. If we do not hear from you, we will assume that our understandings are the same. We are proceeding based on the contents of these meeting notes.

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Rich Stevens retained his position as chair and set three goals for this workgroup could do:

1. Adopt the PAL rules by reference
2. Totally rewrite the rules
3. Adopt parts of the rule and rewrite or clarify certain parts.

Each member of the subcommittee gave their input on which one they would prefer. The consensus felt that adopting the rules by reference with some modifications or clarifications to meet the needs of Iowa industries would be optimal.

Based upon previous experience with “bubble” permits, Chris Roling believed the majority of PALs would be for VOCs, followed by NOx. A PAL for particulate may be more difficult due to modeling requirements. Cyclical operations may be dependent upon pollutant and operation during the past 10 years.

The IDNR will issue PAL permits if the applicant goes through PSD. Permits for individual units would need to be rewritten by local agencies.

Extending a PAL to minor sources would probably need separate rulemaking – other issues should be addressed as a separate discussion.

Each of the questions/issues for NSR reform workgroup consideration was discussed by the committee

1. Will there be a separate PAL permit and who would design it?

Consensus: It will probably a separate permit, but could do similar to “bubble.” Would need separate permit per pollutant.

2. What are monitoring requirements?

Page 80213 of Federal register notice discusses what is required – facility would propose appropriate monitoring. Title V may already require many of these by reference would be best for this item.

3. How good do the emission factors have to be used?

Something that will probably be discussed at time of permitting to see if emission factor is applicable or other testing needed. Fugitives may be challenge – DNR usually goes with what is in AP-42. If using emission factor and AP-42 changes, would PAL permit need to be modified? What if it increases? Will need to address these questions.

4. What is considered to be a significant emission unit?

Presenter stated that no sources would be considered insignificant. The STAPPA document defines small unit. Page 80210 of Federal Register Notice defines significant unit for increase in PAL. Is it possible to quantify all small sources? However, if we leave it the same, does this put an excessive burden on industries? We should consider requirements for record keeping. More discussion next time on this topic.

5. What happens if the unit operates outside the emission factors normal range?

Need to show emission factor applicable and may need stack test to verify.

6. What types of dispersion modeling?

Jim McGraw gave examples of possible modeling scenarios. Moving emission units was an issue. Rule states that an ambient analysis must be provided; VOC probably least concern, PM most concern.

7. How are support facilities handled?

Need to look at definition in NSR, regs states “at stationary sources.” Will readdress – review.

8. What is the mechanism for terminating PAL?

Preamble – redistribute across the sources included in the PAL.

No guarantee that termination will be allowed.

No definition or termination; may want mechanism for Iowa – including situations allowed.

Will evaluate further and come up with clarifications.

It was decided that the committee should split out preamble issues for brief review and analysis of impact.

Assignments were:

Michael	C1, 2, 3
Joe	C4, 5
Larry	C6, 7, 8
Scott	C9, 10
Tom	C1, D1, 2
Steve	D3, 4
Jim	D5, 6, 7
Mick	D8, 9, 10
Lisa	D11, 12, 13

All reviews should be emailed to Rich Stephens by May 24. He will complete and send out to all committee members by the first week of June. A second meeting will be held at a time and date to be determined later.

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**Distribution:**

All Attendees